

AO 91 (Rev. 11/11) Criminal Complaint

~~United States District Court~~
Southern District of Texas
FILED

DEC 30 2019

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America)

v.)

Jesus Israel Gonzalez Prado)

DOB: 1975)

Citizenship: Mexico)

Case No. M-19-3162-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 27, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

31 USC § 5332

Offense Description

Knowingly conceals over \$10,000.00, that is, approximately \$326,300.00 in United States Currency, on the person of such individual or in any conveyance, article of luggage, merchandise or other container, and transports or transfers or attempts to transport or transfer said currency from a place within the United States to a place outside the United States, that is, the United Mexican States, with the intent to evade a currency reporting requirement.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

s/ S/A Randal Hill

Complainant's signature

Randal Hill, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence:

Date: 12/28/2019 @ 1:28 p.m.

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

ATTACHMENT A

On December 27, 2019, a vehicle driven by Jesus Israel Gonzalez PRADO entered the Anzaldua's, Texas Port of Entry (POE), traveling outbound from the United States (US) into Mexico. PRADO was the sole occupant of the vehicle. During outbound inspection, a United States Customs and Border Protection Officer (CBPO) obtained a negative declaration for currency or monetary instruments in excess of \$10,000.00 from PRADO. CBPOs referred PRADO to secondary inspection for further questioning. There PRADO stated he purchased the vehicle approximately two months ago however just received the vehicle the day before.

During additional inspection, CBPOs noticed that the floorboard of the vehicle was unusually raised, making the cabin area of the vehicle much smaller and uncharacteristic of routinely inspected vehicles. CBPOs located a non-factory hidden compartment under the entire floorboard of the vehicle. Inside of the hidden compartment, approximately \$326,300 in United States Currency was concealed wrapped in paper and plastic.

HSI McAllen Special Agents responded to the POE to interview PRADO in which he invoked his rights and refused to answer questions.

Upon further investigation it was revealed that this vehicle crossed into the United States through a US POE approximately thirty-four times within the past 18 month period. Additionally, approximately two months earlier PRADO himself traveled into the United States in this same vehicle with an individual who has been under investigation for financial crimes.